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Attorneys for Defendant
COLE HAAN

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

TAMMIE DAVIS, an individual, on behalf of
herself and all others similarly situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 11-cv-01826-JSW

**AMENDED JOINT STIPULATION AND
[PROPOSED] ORDER RE CONSOLIDATION
OF ACTION AND CONSOLIDATED
COMPLAINT**

Hon. Jeffrey S. White
Courtroom 11, 19th Floor

STEFANI CONCEPCION, an individual, on
behalf of herself and all others similarly
situated,

Plaintiff,

v.

COLE HAAN, INC., a New York
Corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 11-cv-02187-JSW

COORDINATED CASE No. 11-cv-02187-JSW

1 Plaintiffs Tammie Davis and Stefani Concepcion (“plaintiffs”) and defendant Cole
 2 Haan¹, by and through their respective counsel, jointly submit the following Amended
 3 Stipulation regarding consolidation of the above-referenced actions for all purposes and the filing
 4 of plaintiffs’ consolidated complaint on or before November 14, 2011.

5 RECITALS

6 **WHEREAS**, on June 29, 2011, Judge White issued an order coordinating the above-
 7 captioned related cases (*Concepcion v. Cole Haan Inc.*, Case No. 11-cv-02187-JSW, ECF No.
 8 19); and

9 **WHEREAS**, the parties agree that the above-referenced actions should be consolidated for
 10 all purposes because it will promote the interests of judicial economy and efficiency; and

11 **WHEREAS**, the parties agree that plaintiffs should file a consolidated complaint; and

12 **WHEREAS**, plaintiffs agree that Stonebarger Law, APC and Patterson Law Group, APC
 13 shall serve as co-lead plaintiffs’ counsel once the above-referenced actions are consolidated;

14 STIPULATION

15 **NOW, THEREFORE, IT IS STIPULATED AND AGREED**, by the parties, through their
 16 respective counsel of record, that (1) the above-referenced actions shall be consolidated for all
 17 purposes, and (2) that plaintiffs shall file a consolidated complaint on or before November 14,
 18 2011. Plaintiffs further agree that Stonebarger Law, APC and Patterson Law Group, APC shall
 19 serve as co-lead plaintiffs’ counsel once the above-referenced actions are consolidated.

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28 ¹ Cole Haan was erroneously sued as “Cole Haan, Inc.”

1 **IT IS SO STIPULATED.**

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3 Dated: November 4, 2011

COOLEY LLP
MICHELLE C. DOOLIN
BEATRIZ MEJIA
JENNIFER M. FRENCH
MATTHEW M. BROWN

6
7 /s/ Beatriz Mejia
Beatriz Mejia

8 Attorneys for Defendant
9 COLE HAAN

10 Dated: November 4, 2011

PATTERSON LAW GROUP, APC
JAMES R. PATTERSON

12 /s/ James R. Patterson
13 James R. Patterson

14 Attorneys for Plaintiff
TAMMIE DAVIS

15 Dated: November 4, 2011

STONEBARGER LAW, APC
GENE J. STONEBARGER
RICHARD D. LAMBERT

18 /s/ Gene J. Stonebarger
Gene J. Stonebarger

19 Attorneys for Plaintiff
20 STEFANI CONCEPCION

FILER'S ATTESTATION

Pursuant to General Order No. 45, Section X, Subparagraph B, the undersigned attests that all parties have concurred in the filing of this Amended Joint Stipulation and [Proposed] Order re Consolidation of Action and Consolidated Complaint.

Dated: November 4, 2011

COOLEY LLP
MICHELLE C. DOOLIN
BEATRIZ MEJIA
JENNIFER M. FRENCH
MATTHEW M. BROWN

/s/ Matthew M. Brown
Matthew M. Brown

Attorneys for Defendant
COLE HAAN

IT IS SO ORDERED.

Dated: November 7, 2011


The Honorable Jeffrey S. White
United States District Judge